

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA**

STATE OF OKLAHOMA,

Plaintiff,

v.

MIGUEL CARDONA, in his official capacity
as the Secretary of Education for the United
States Department of Education; and UNITED
STATES DEPARTMENT OF EDUCATION,

Defendants.

Case No. 5:24-cv-0461-JD

MOTION FOR RELIEF UNDER LOCAL CIVIL RULE 83.3(c)

In accordance with the Local Rules for the United States District Court, Western District of Oklahoma, the undersigned, Giancarlo G. Piccinini, hereby moves for relief under L. Civ. R. 83.3(c) to appear *pro hac vice* without local counsel for the purpose of participating as counsel for proposed *amici curiae* the States of New Jersey, California, and Pennsylvania (“Proposed State Amici”)¹ in the above-captioned action:

1. I am a Deputy Attorney General with the State of New Jersey, Department of Law and Public Safety, Division of Law.

2. In accordance with L. Civ. R. 83.3(c), I request relief to appear for the Proposed State Amici without joinder of local counsel. Proposed State Amici are not

¹ Proposed State Amici intend to file a Motion for Leave to Appear as Amici Curiae on or about July 17, 2024.

parties to this action and seek only to file an amicus curiae brief in opposition to Plaintiff's pending motion for Preliminary Injunction, ECF No. 21. Proposed State Amici do not seek party status or oral argument time, but only to file an amicus brief to provide the Court with useful information to aid the Court in resolving the pending motions. Given the minimal involvement of Proposed State Amici in this matter, the obligations and duties of counsel can be fulfilled without the necessity of local counsel. Further, the time and expense required to locate, screen, and educate local counsel in this posture presents a hardship to Proposed State Amici.

3. I am experienced in using the CM/ECF system in multiple federal courts and have reviewed the training materials provided on this Court's website. I also certify that I have reviewed and am familiar with this Court's Local Rules.

Respectfully submitted,



Giancarlo G. Piccinini
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CERTIFICATE OF SERVICE

I hereby certify that on July 13, 2024, I presented the foregoing Motion for Relief under L. Civ. R. 83.3(c) to the Clerk of Court for filing and uploading to the CM/ECF system, which will send notification of such filing to all counsel of record.



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